

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

PATRICK JACK and LESLIE JACK,  
husband and wife,

Plaintiffs,

v.

ASBESTOS CORPORATION LTD, et al.,

Defendants.

Case No. 2:17-cv-00537-JLR

**STIPULATION AND ~~PROPOSED~~  
ORDER FOR EXTENSION OF TIME  
TO TAKE THE DEPOSITION OF  
UNION PACIFIC RAILROAD  
COMPANY'S CORPORATE  
REPRESENTATIVE**

Counsel for Defendant Union Pacific Railroad Company ("Union Pacific") and counsel for Plaintiffs Leslie Jack and David Jack ("Plaintiffs"), hereby stipulate to an extension of time beyond the current discovery cutoff of June 18, 2018, solely for the purposes of conducting the deposition of Union Pacific's corporate representative pursuant to Federal Rule of Civil Procedure 30(b)(6).

Due to numerous scheduling conflicts, Union Pacific is unable to produce a corporate representative on or before June 18, 2018. The parties are meeting and conferring in good faith to obtain a mutually convenient date, time, and location and have agreed that the deposition will go forward no later than July 18, 2018.

1 Union Pacific notified all defendants of this stipulation and proposed order with no  
2 objections.

3 DATED this 13th day of June 2018.

4 LANE POWELL PC

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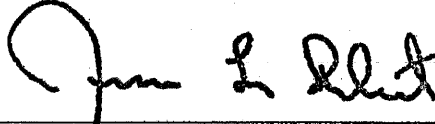
24 DEAN OMAR BRANHAM, LLP

25 By: /s/ Benjamin H. Adams  
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**[PROPOSED] ORDER**

Based on the foregoing Stipulation, it is hereby ORDERED that the discovery deadline for the deposition of Union Pacific's corporate representative may be extended to July 18, 2018.

DATED this 14<sup>th</sup> day of June 2018.



THE HONORABLE JAMES L. ROBART

No other  
deadlines  
shall be  
extended.

**CERTIFICATE OF SERVICE**

Pursuant to RCW 9A.72.085, the undersigned certifies under penalty of perjury under the laws of the State of Washington, that on the 13<sup>th</sup> day of June 2018, the document attached hereto was presented to the Clerk of the Court for filing and uploading to the CM/ECF system. In accordance with their ECF registration agreement and the Court's rules, the Clerk of the Court will send e-mail notification of such filing to the following persons:

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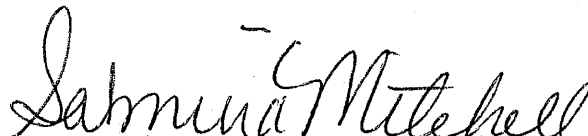
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and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

Executed on the 13<sup>th</sup> day of June 2018.

  
Sabrina Mitchell